

Final Supplement to the

Mono County

General Plan Land Use Amendments

Final Environmental Impact Report

(FEIR)

SCH #98122016 & #2004082091

Prepared for Benton Crossing Landfill

General Plan Amendment #04-02

Use Permit Application #37-04-08

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TABLE OF CONTENTS

I. Introduction 1

 Introduction 1

 Contents of the Final EIR 1

 Final EIR Process 1

 Persons & Organizations Commenting on the Draft EIR 2

 Key Points Raised In Comments 2

 Response to Comments 3

Appendix A Benton Crossing Landfill Mitigation Monitoring Plan A-1

Appendix B Comment Letter from CIWMB B-1

I. INTRODUCTION

INTRODUCTION

The Final EIR contains the response to comments received on the Draft Supplemental Environmental Impact Report (DSEIR) for the General Plan Land Use Amendments and Use Permit for Benton Crossing Landfill. The DSEIR is incorporated herein by reference. The Mitigation Monitoring Plan for the General Plan Land Use Amendments and Use Permit for Benton Crossing Landfill is included in the Final EIR as Appendix A.

The Final EIR documents are available for the cost of reproduction from the Mono County Community Development Department offices in Bridgeport, (760) 932-5420, or Mammoth Lakes, (760) 924-1800.

CONTENTS OF THE FINAL EIR

In compliance with CEQA requirements, the Final EIR for Benton Crossing Landfill includes the following:

- (a) The Draft EIR or a revision of the Draft.
- (b) Comments and recommendations received on the Draft EIR, either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.
(CEQA Guidelines Section 15132)

FINAL EIR PROCESS

The Draft Supplemental EIR for the General Plan Land Use Amendments and Use Permit for Benton Crossing Landfill was circulated for public comment from December 16, 2004, through January 31, 2005. One written comment was received from a state agency.

The Final EIR must be certified before Mono County (as Lead Agency taking action on the project) can approve the General Plan Land Use Amendments and the Use Permit for Benton Crossing Landfill. In order to certify the Final EIR, the Lead Agency must conclude that:

- (1) The Final EIR has been completed in compliance with CEQA;
- (2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and,
- (3) The Final EIR reflects the lead agency's independent judgment and analysis.
(CEQA Guidelines Section 15090)

After the Final EIR is certified, the Lead Agency files a Notice of Completion, starting a 30-day statute of limitations period under CEQA for challenging the approval of the Final EIR.

Where environmental effects have been identified as significant in an EIR and the Lead Agency intends to approve the project, the Lead Agency must prepare written findings on each environmental impact identified as significant. Findings must include a brief explanation of the rationale for each finding. The possible findings are:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.
(CEQA Guidelines Section 15091)

When making findings to support (1) above, a mitigation monitoring program must be included in the Final EIR to ensure CEQA compliance during project implementation. A proposed mitigation monitoring program for Benton Crossing Landfill is included in Appendix A.

PERSONS & ORGANIZATIONS COMMENTING ON THE DRAFT EIR

Comments on the DSEIR were received from the following entities:

1. California Integrated Waste Management Board (CIWMB).

The comment letter from the CIWMB is reprinted in its entirety in Appendix B.

KEY POINTS RAISED IN COMMENTS

The CIWMB made the following key points in its comment letter dated February 1, 2005:

- (a) According to the "project analyzed," the analysis did not include the impacts associated with the increase in tonnage and traffic.
- (b) In order to evaluate the CEQA document for CIWMB permit concurrence purposes, the Project Description should clearly describe the proposed revisions to the [Solid Waste Facility Permit (SWFP)].
 - 1) Peak tons per day
 - 2) Peak vehicles per day
 - 3) Hours of operation and the hours the landfill is opened to the public to receive waste
- (c) The current SWFP issued June 14, 1978 states the facility is 90 acres, the Project Description indicates the existing facility is 95.05 acres. Please explain the difference in acreage.
- (d) Page 6 indicates the "Benton Crossing Landfill received an average of 108 tons of waste per day in 2002 and 2003." Page 7 states that based on the waste flow calculations, "the

daily disposal rate is calculated to increase from 81.0 tons per day in 2004 to 108.4 tons per day in 2023.” If the Landfill’s average in 2002 and 2003 is 108 tons per day, the waste flow calculations appear to be incorrect.

- (e) The Traffic Volume Calculations Table on page 53 states “Peak Average Weekday Average Daily Traffic Volume.” What is the peak (maximum) number of vehicles analyzed for in the DSEIR. The Board concurs on permits indicating peak or maximum numbers, not averages.
- (f) Page 20 states, “Final closure plans for the landfill do not contain any plans for revegetation; naturally-occurring revegetation is expected to slowly colonize the site.” Referring to the borrow pit, page 21 states, “There are no plans to revegetate this area.” This is in conflict with Mitigation Measure VR-6 which states, “The landfill, including the soil borrow pit in the northern expansion area, shall be revegetated during the closure construction phase with a native seed mix.” Please clarify.
- (g) Page 34 states the landfill operates only during daylight hours; from 8 am to 4 pm on weekdays and 8 am to 12 pm on weekends in the winter (October 1 – April 30), and from 8:30 am to 4:45 pm weekdays and 8:30 am to 12:30 pm on weekends in summer (May 1 – September 30). This is in conflict with the RDSI, which states on page 4 that personnel are on site until 5:00 & 5:30.
- (h) Wood chips are used for erosion protection and are routinely monitored and evaluated. Page 20 states an alternative method of erosion control will be implemented if necessary. Please describe the alternative method of erosion control.
- (i) Expansion plans include the installation of additional covered storage for household hazardous waste (HHW). Page 18 states that the new HHW facility is dependent upon securing a grant from the CIWMB. How will HHW be handled if a grant is not secured?
- (j) The eastern boundary expansion encompasses Pit Road. How will public access to the facility and Pit Road be maintained?
- (k) Page 44 indicates there were concerns expressed regarding the long-term visual impacts. The finished contours and shaping of the landfill should ensure consistency with the surrounding topography. Additional diagrams and photo simulations would be helpful.

RESPONSE TO COMMENTS

Responses to the comments from the CIWMB are presented in this section. Each comment from the CIWMB is followed by its response.

Comment A: According to the “project analyzed,” the analysis did not include the impacts associated with the increase in tonnage and traffic.

Response: The analysis in the DSEIR includes the impacts associated with the increase in tonnage and traffic (see Circulation Section). As noted in the DSEIR:

“The ‘project’ analyzed in this Supplemental EIR is the expansion of the property boundaries and the Public Facilities (PF) land use designation at Benton Crossing Landfill to allow for the installation and maintenance of additional environmental monitoring devices and drainage facilities, to provide sufficient soil borrow resources to meet daily, intermediate, and final cover needs for the remainder of the facility’s life and to permit a variety of landfill activities on-site to meet the needs of the waste disposal requirements of the service area through the year 2023. Meeting the project objective will require approval of General Plan Amendment 04-02 and Use Permit 37-04-08.”

Although the “project analyzed” does not specifically talk about tonnage and traffic, analysis of those topics is inherent throughout the discussion in the DSEIR, particularly in the sections that address Vegetation and Wildlife, Visual Resources, and Circulation. The Project Description in Chapter 2 delineates the estimated increase in tonnage.

Comment B: In order to evaluate the CEQA document for CIWMB permit concurrence purposes, the Project Description should clearly describe the proposed revisions to the SWFP.

- 1) Peak tons per day
- 2) Peak vehicles per day
- 3) Hours of operation and the hours the landfill is opened to the public to receive waste

Response: While the DSEIR addresses the proposed revisions in the SWFP and associated environmental impacts resulting from the proposed revisions, the following language will be added to the Permits Section on page 5 of the DSEIR to clarify the differences between the current SWFP and the proposed revisions to the SWFP.

To be added:

The existing Solid Waste Facility Permit (approved in 1978) contains the following limitations and specifications:

Types of Waste Permitted for Receipt: Household, commercial, recreational, institutional and construction waste; septic tank pumpings; bulky—autos, appliances and trailers.

Prohibitions: Hazardous waste except septic tank pumpings.

Peak Daily Tonnage: 10 tons per day.

Hours and Days of Operation: 8:30 am to 5:30 pm, daily except Wednesday.

Peak Daily Number of Vehicles: None specified.

Permitted Area: 90 acres.

Total Design Capacity: None specified.

Expected Site Life: 45 years, 2023.

Proposed revisions to the SWFP (requested in 2005) include the following:

Types of Waste Permitted for Receipt: Non-hazardous municipal solid waste, including residential, commercial, institutional, light industrial, and construction and demolition wastes; wood and green waste; dried sewage sludge; appliances, scrap metal, and auto bodies; waste tires; dead animals; non-friable asbestos; household hazardous waste, electronic waste, and universal waste (for management only).

Prohibitions: Hazardous, radioactive, medical, liquid, designated, or other wastes requiring special treatment or handling, except as identified in the RDSI and approved by the enforcement agency and other federal, state, or local agencies.

Permitted Maximum Tonnage: 45,400 tons per year (maximum 500 tons per day).

Permitted Hours of Operation:

7:30 am – 5:30 pm, seven days per week

Holidays: New Year's Day, Presidents' Day, Memorial Day, July 4th, Thanksgiving, Christmas

Permitted Traffic Volume: 100 vehicles per peak day

Permitted Area: 145.06 acres

Total Design Capacity: 2,617,900 cubic yards

Estimated Closure Year: 2023

The impacts associated with increases in tonnage, traffic volumes, permitted areas, and total design capacity are addressed throughout the DSEIR.

Comment C: The current SWFP issued June 14, 1978 states the facility is 90 acres, the Project Description indicates the existing facility is 95.05 acres. Please explain the difference in acreage.

Response: The existing facility is 95.05 acres. Record of Survey 37-31, recorded on 11/03/88, established property corners for the Benton Crossing Landfill lease boundary and identifies bearings and distances for each boundary line. The acreage encompassed within the boundaries established by the Record of Survey is 95.05 acres. The bearings and distances utilized on the base maps and technical drawings in the Joint Technical Document for Benton Crossing Landfill [Report of Disposal Site Information (RDSI) and the Preliminary Closure and Postclosure Maintenance Plan (PCPMP)] are the bearings and distances identified in the Record of Survey for the property.

The June, 1978 SWFP, the 1989 and 1995 RDSIs for Benton Crossing Landfill, and the current Los Angeles Department of Water and Power (LADWP) lease document for the landfill all contain incorrect information concerning the property acreage and boundaries.

Comment D: Page 6 indicates the "Benton Crossing Landfill received an average of 108 tons of waste per day in 2002 and 2003." Page 7 states that based on the waste flow

calculations, “the daily disposal rate is calculated to increase from 81.0 tons per day in 2004 to 108.4 tons per day in 2023.” If the Landfill’s average in 2002 and 2003 is 108 tons per day, the waste flow calculations appear to be incorrect.

Response: The section on Waste Quantities on page 6 states that Benton Crossing Landfill received an average of 108 tons of waste per day in 2002 and 2003 and then goes on to explain that approximately 71 percent (77 tons per day) was landfilled and approximately 29 percent (31 tons per day) was diverted through the waste diversion program. In that section, the analysis is addressing the total amount of waste received at the landfill.

The section on Estimated Waste Flow and Site Life on page 7 states that:

“The total annual amount of waste landfilled is estimated to increase from 29,000 tons per year in 2004 to 38,800 tons per year in 2023 (RDSI, Appendix E, Table E-1). The resulting daily disposal rate is calculated to increase from 81.0 tons per day in 2004 to 108.4 tons per day in 2023 (RDSI, Appendix E, Table E-1).”

The section on Estimated Waste Flow and Site Life is discussing the amount of waste to be landfilled, not the total amount of waste received at the landfill.

Comment E: The Traffic Volume Calculations Table on page 53 states “Peak Average Weekday Average Daily Traffic Volume.” What is the peak (maximum) number of vehicles analyzed for in the DSEIR. The Board concurs on permits indicating peak or maximum numbers, not averages.

Response: The third column in Table 1, Traffic Volume Calculations, has been revised to indicate that it is the Peak Daily Traffic Volume that was calculated for the DSEIR and that is being used in the analysis.

Comment F: Page 20 states “Final closure plans for the landfill do not contain any plans for revegetation; naturally-occurring revegetation is expected to slowly colonize the site.” Referring to the borrow pit, page 21 states “There are no plans to revegetate this area.” This is in conflict with Mitigation Measure VR-6 which states “The landfill, including the soil borrow pit in the northern expansion area, shall be revegetated during the closure construction phase with a native seed mix.” Please clarify.

Response: The comments on pages 20 and 21 pertaining to revegetation were mistakenly left in the draft. They will be deleted from the Final EIR and replaced with the following language:

Page 20: To be deleted (deletions indicated by ~~striketrough~~ print, additions indicated by **bold and italic** print):

“The 12 inches of soil over the GCL is intended to accommodate root growth for ~~naturally-occurring vegetation. Final closure plans for the landfill do not contain any~~

~~plans for revegetation; naturally occurring revegetation is expected to slowly colonize the site.~~ ***revegetation; the entire site will be revegetated with a native seed mix during the final construction phase (see Vegetation Section).***

Page 21: To be deleted (deletions indicated by ~~striketrough~~ print, additions indicated by ***bold and italic*** print):

~~“There are no plans to revegetate this areas; naturally occurring vegetation is expected to slowly colonize the site. Though the pit will be lower than the surrounding landscape, there will still be some potential for dust generation and soil erosion~~ ***until the site is revegetated following final closure construction (see Vegetation Section).***”

Comment G: Page 34 states the landfill operates only during daylight hours; from 8 am to 4 pm on weekdays and 8 am to 12 pm on weekends in the winter (October 1 – April 30), and from 8:30 am to 4:45 pm weekdays and 8:30 am to 12:30 pm on weekends in summer (May 1 – September 30). This is in conflict with the RDSI, which states on page 4 that personnel are on site until 5:00 & 5:30.

Response: On page 34, the DSEIR states that:

“The landfill operates only during daylight hours, from 8 am to 4 pm on weekdays and 8 am to 12 pm on weekends in the winter (October 1 – April 30), and from 8:30 am to 4:30 pm weekdays and 8:30 am to 12:30 pm on weekends in the summer (May 1 – September 30).”

This is consistent with Table 2.1 on page 4 of the RDSI that shows that the landfill is open to the public during the hours stated above. Table 2.1 also shows that landfill personnel are on-site one-half hour before the landfill opens to the public in the morning, one hour after it closes on weekdays, and 5 hours after it closes on weekends. The sentence quoted above will be changed as follows to clarify this (deletions are in ~~striketrough~~ print, additions are in ***bold and italic*** print):

“The landfill ~~operates~~ ***is open to the public*** only during daylight hours, from 8 am to 4 pm on weekdays and 8 am to 12 pm on weekends in the winter (October 1 – April 30), and from 8:30 am to 4:30 pm weekdays and 8:30 am to 12:30 pm on weekends in the summer (May 1 – September 30). ***Landfill personnel are on-site before and after the landfill is open to the public.***”

Comment H: Wood chips are used for erosion protection and are routinely monitored and evaluated. Page 20 states an alternative method of erosion control will be implemented if necessary. Please describe the alternative method of erosion control.

Response: The comment on page 20 pertaining to an alternative method of erosion control other than wood chips was mistakenly left in the draft. It will be deleted from the Final EIR and replaced with the following language:

Page 20: To be deleted (deletions indicated by ~~striketrough~~ print, additions indicated by ***bold and italic*** print):

“Mono County has successfully used wood chips for erosion protection at several of the County's existing landfill and transfer station sites. The effectiveness of wood chips in this application will be routinely monitored and evaluated in compliance with State regulations. ~~An alternative method of erosion control will be implemented if necessary.~~ The potential for wind and water erosion of the final cover surface is considered negligible due to use of the wood chip layer ***and the proposed revegetation*** (PCPMP, p. 5).”

See the response to Comment F above that pertains to information in the same paragraph in the DSEIR.

Comment I: Expansion plans include the installation of additional covered storage for household hazardous waste (HHW). Page 18 states that the new HHW facility is dependent upon securing a grant from the CIWMB. How will HHW be handled if a grant is not secured?

Response: If a grant is not secured, the cost of the additional household hazardous waste storage facility will be funded by the Mono County Department of Public Works annual budget. The sentence referenced in Comment I will be deleted from the DSEIR (deletions are indicated by ~~striketrough~~ print):

“The expansion plans for Benton Crossing Landfill include the installation of additional covered storage for household hazardous waste. The landfill does not accept any other type of hazardous materials or waste. Current plans are for a pole-barn style structure with a concrete slab and perimeter containment curbing mounted with a perimeter chain-link fence with vinyl slats. This design would provide a covered work area protected from the weather, but would allow air circulation. ~~The installation of a new household hazardous waste facility is dependent upon securing a grant from the California Integrated Waste Management Board to supplement the landfill's existing facilities.~~”

Comment J: The eastern boundary expansion encompasses Pit Road. How will public access to the facility and Pit Road be maintained?

Response: Pit Road is a County-maintained, paved, public road that is part of the County Road System. Public access to the landfill and Pit Road will not be affected by the property expansion. The eastern expansion area will incorporate existing monitoring wells and allow for the installation and maintenance of additional environmental monitoring devices and a storm water detention basin (page 1, DSEIR). The area will not be fenced. There is existing perimeter fencing (4-strand barbed-wire) around the waste disposal area and the on-site retention basins, except for the retention basin proposed in the eastern expansion area. Since the landfill is proposing a vertical expansion of the waste footprint, and no lateral expansion, the perimeter fencing around the waste disposal area will

remain in place, where it is now, throughout the life of the landfill and the postclosure period.

Plans for the landfill include the potential future installation of permanent litter fencing along the eastern boundary of the fill area. That fence, if installed, will not impact access to the landfill nor the traveling public on Pit Road.

Comment K: Page 44 indicates there were concerns expressed regarding the long-term visual impacts. The finished contours and shaping of the landfill should ensure consistency with the surrounding topography. Additional diagrams and photo simulations would be helpful.

Response: Mitigation Measure VR-5, which requires a landscape architect to design the final cover over the engineered waste mass, is intended to ensure that the finished contours and shaping of the landfill are consistent with the surrounding topography. In addition, Mitigation Measure VR-6, which requires revegetation of the entire site including the soil borrow pit in the northern expansion area, is intended to ensure that the site blends into the surrounding area.

Drawings and diagrams of the proposed finished contours and shaping of the landfill, prepared by a landscape architect as required by Mitigation Measure VR-5, will be reviewed by the Mono County Community Development Department and/or the Planning Commission to ensure consistency with the surrounding topography.

APPENDIX A

Benton Crossing Landfill Mitigation Monitoring Plan

Over the life of the project, the Mono County Community Development Department (Planning, Building, Code Enforcement) will utilize the Compliance Checklist for the Benton Crossing Landfill Use Permit/SEIR to ensure that all requirements, including approved mitigation measures, are met at the appropriate phase of the project. The final checklist will be maintained as a separate file for the project and will be consulted throughout the life of the project to ensure that development occurs in compliance with the provisions of the Use Permit and the SEIR.

Compliance Checklist: Benton Crossing Landfill Use Permit / Final SEIR

(A copy of pertinent permits or approvals should be attached to this checklist).

(This checklist addresses compliance for the Benton Crossing Landfill, including Use Permit conditions, and mitigation measures from the SEIR).

Project Benchmark: Within Six Months of Project Approval

Approvals / Permits / Mitigation Required	Monitoring Department	Contact for Compliance	Date Completed	Staff Initials	Notes
VW-3 The speed limit on Pit Road shall be limited to 25 mph. Within six months of the approval of this project, speed limit signs shall be posted on Pit Road at its junction with Benton Crossing Road and at the exit from the landfill.	CDD	Public Works			

Compliance Checklist: Benton Crossing Landfill Use Permit / Final SEIR

(A copy of pertinent permits or approvals should be attached to this checklist).

(This checklist addresses compliance for the Benton Crossing Landfill, including Use Permit conditions, and mitigation measures from the SEIR).

Project Benchmark: Prior to Issuance of Building Permits for On-Site Construction

Approvals / Permits / Mitigation Required	Monitoring Department	Contact for Compliance	Date Completed	Staff Initials	Notes
VR-1 Building materials and colors for additional structures on-site (e.g., household hazardous waste building, monitoring wells) shall be compatible with the surrounding environment. Reflective materials shall not be allowed. Colors shall be muted earth tones (i.e., browns, greens). Roof colors shall be muted, non-reflective dark earth tones (i.e., brown, green).	CDD	Public Works			
VR-2 Colors for the proposed litter fencing shall be muted dark non-reflective tones (i.e., dark green or brown).	CDD	Public Works			

Compliance Checklist: Benton Crossing Landfill Use Permit / Final SEIR

(A copy of pertinent permits or approvals should be attached to this checklist).

(This checklist addresses compliance for the Benton Crossing Landfill, including Use Permit conditions, and mitigation measures from the SEIR).

Project Benchmark: Prior to Development in Eastern Expansion Area

Approvals / Permits / Mitigation Required	Monitoring Department	Contact for Compliance	Date Completed	Staff Initials	Notes
VW-1 Prior to the construction or installation of any additional landfill facilities in the eastern expansion area, the County shall have a botanist survey that area to ensure that the location of proposed landfill facilities will not impact sensitive plant species. If sensitive plant species are encountered during that survey, the project shall be redesigned to avoid those species and identified populations shall be protected during construction.	CDD	Public Works			

Compliance Checklist: Benton Crossing Landfill Use Permit / Final SEIR

(A copy of pertinent permits or approvals should be attached to this checklist).

(This checklist addresses compliance for the Benton Crossing Landfill, including Use Permit conditions, and mitigation measures from the SEIR).

Project Benchmark: Ongoing Throughout the Life of the Project

Approvals / Permits / Mitigation Required	Monitoring Department	Contact for Compliance	Date Completed	Staff Initials	Notes
GS-1 Construction activities on-site shall comply with all Mono County standards and best management practices for erosion control, including the following: <ul style="list-style-type: none"> a. Covering disturbed soils with wood chips until construction is complete. b. Controlling exotic weed species. c. Project phasing to minimize exposed or excavated areas. d. Watering of disturbed soils, particularly in high use areas. A water truck shall be present on-site during construction activities. e. Using wind erosion construction barriers on sites exposed to wind erosion during initial excavation. f. Covering, wind fencing around, or wetting of stockpiled earth materials. g. Limiting the speed of construction equipment, trucks, and other vehicles to 15 mph on-site. 	CDD	Public Works Landfill Supervisor			
VW-2 The spread of weeds shall be deterred by covering stockpiled topsoil.	CDD	Public Works Landfill Supervisor			

Project Benchmark: Ongoing Throughout the Life of the Project, continued...

Approvals / Permits / Mitigation Required	Monitoring Department	Contact for Compliance	Date Completed	Staff Initials	Notes
VW-4 On an on-going basis, the Mono County Department of Public Works shall provide information to the public, to contractors, to public agencies, and to private trash haulers concerning state requirements for covered loads on state highways.	CDD Public Works	Public Works Landfill Supervisor			
VW-5 Poles utilized for the proposed litter fencing shall be topped with spikes designed to prevent birds from perching on top of the poles.	CDD	Public Works			
VW-6 Mono County shall work closely with sage grouse conservation efforts in Long Valley to minimize harm to sage grouse populations.	CDD Public Works	Public Works Landfill Supervisor			
VW-7 The bird cannon shall be moved around the landfill in a random pattern and shall be fired intermittently to maximize its effectiveness.	CDD Public Works	Public Works Landfill Supervisor			
VW-8 Mono County shall restrict new construction activities during sage-grouse breeding and nesting periods from March 15 through June 15 annually.	CDD Public Works	Public Works Landfill Supervisor			
VR-3 Heavy equipment stored on-site shall be placed behind structures whenever possible.	CDD Public Works	Public Works Landfill Supervisor			
VR-4 Wind-blown litter shall be controlled, potentially through the installation of a litter fence similar to the prototype shown in Figure 8.	CDD	Public Works			

Project Benchmark: Ongoing Throughout the Life of the Project, continued...

Approvals / Permits / Mitigation Required	Monitoring Department	Contact for Compliance	Date Completed	Staff Initials	Notes
CR-1. If evidence of potentially significant cultural resources is discovered during development, a mitigation plan shall be completed prior to further construction or earth disturbance.	CDD Public Works	Public Works Landfill Supervisor			
CR-2. To protect Native American burial sites if they are discovered, the provisions of section 7050.5 of the Health and Safety Code shall be followed [CEQA Section 15126.4(b)].	CDD Public Works	Public Works Landfill Supervisor			

Compliance Checklist: Benton Crossing Landfill Use Permit / Final SEIR

(A copy of pertinent permits or approvals should be attached to this checklist).

(This checklist addresses compliance for the Benton Crossing Landfill, including Use Permit conditions, and mitigation measures from the SEIR).

Project Benchmark: During Closure Construction

Approvals / Permits / Mitigation Required	Monitoring Department	Contact for Compliance	Date Completed	Staff Initials	Notes
VR-5 Under the direction of the Public Works Director, a landscape architect shall create the final landscape plan for the entire site prior to the start of the closure construction phase so that the landfill appears to be a more naturally-occurring feature that includes such attributes as tapered toes, rounded tops, and undulating surfaces. The landfill shall be constructed as indicated in the engineered drawings included in the Joint Technical Document (JTD) for the landfill. The landscape architect shall design the final surface over the engineered waste mass.	CDD	Public Works			
VR-6 The landfill, including the soil borrow pit in the northern expansion area, shall be revegetated during the closure construction phase with a native seed mix. The seed mix shall be planted at the optimal time of year for germination. Revegetated areas shall be monitored to achieve a density of cover similar to the density in surrounding naturally-vegetated areas.	CDD	Public Works			

APPENDIX B

Comment Letter from the California Integrated Waste Management Board (CIWMB)